

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Processing Network  
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FIRST SET  
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO  
UNITED STATES POSTAL SERVICE WITNESS BRATTA (PR/USPS-T-5: 1-4)

(December 21, 2011)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Due to availability of the Public Representative and staff to review Postal Service answers, and the press of other business over the coming holidays, the Public Representative proposes that the witness provide answers no later than January 12, 2012, rather than the customary 14 days. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for  
Docket No. N2012-1

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**PR/USPS-T-5-1**

Please refer to page 13, footnote 1, of your testimony where you state: "My testimony is based on the assumption that affected facilities will be completely closed. However, only 95 percent of Labor Distribution Codes 37 and 38 and non-personnel costs will be realized as savings. The balance of the 5 percent is attributed to those functions that are not affected by Network Rationalization. Facilities that require building systems support may be supported by FMO operations or Building Equipment Mechanics until the facility is eliminated from inventory. The estimates in my testimony are based on the "full-up" environment where all closed facilities have been sold or leased."

- a. Please provide the basis for the 95 percent estimate.
- b. Are there any estimates of expenses associated with the leasing or selling facilities? If so, please provide the estimates.
- c. Please identify any analysis or data supporting the calculation of the potential costs associated with layoffs or relocations.

**PR/USPS-T-5-2**

Please refer to page 19, footnote 3, of your testimony which states: "To the extent that some closed facilities have multiple purposes and house operations not impacted by Network Rationalization, maintenance and utility costs might not be eliminated completely. But for these multi-purpose facilities, I anticipate that operations unaffected by Network Rationalization will account for a small percentage of the total building capacity."

- a. Have you performed any analysis to estimate the number (or percentage) of such multi-purpose facilities? Please explain, and if available, provide the estimates.
- b. Please explain the basis for the statement that for multi-purpose facilities "operations unaffected by Network Rationalization will account for a small percentage of the total building capacity."

**PR/USPS-T-5-3**

Please refer to USPS-LR-31, Maintenance Materials, Summary of Maintenance Labor and Other Savings Nov 24th.xlsm.

- a. Please confirm that the column entitled "Workyears" in Sheet: "Prod Hrly Rates," is equivalent to Full Time Equivalent Employees (FTEs). If confirmed, please reconcile or explain the sum of base FTEs in Sheet: "Nov 9th," to the

sum of labor FTEs or labor plus management FTEs in the worksheet "Prd Hrly Rates.

- b. Please provide a library reference with the data and calculations used to determine the proposed FTEs for LDCs 36-39 in Worksheet Nov 9th. If unable to provide the data and calculations, please provide a full explanation of the method used.

**PR/USPS-T-5-4**

Please refer to USPS-LR-33 Spare Parts, Copy of FY11\_Parts\_Network Consolidation Analysis.xls, Sheet: "1." Please clarify the meaning of Cell A9, "Estimated % Mail Processing Equipment Removals as % of Total Fleet." Please confirm that this cell refers to the percentage reduction mail processing equipment that would occur if the proposed network redesign plan were implemented.

- a. If confirmed, please provide the data and calculations used to derive the 40 percent figure.
- b. If not confirmed, please explain the meaning of cell A9 and explain how it was calculated.